



FEDERAL ELECTION COMMISSION  
Washington DC 20463

THIS IS THE BEGINNING OF ADMINISTRATIVE FINE CASE # 2683

DATE SCANNED 2/23/15

SCANNER NO. 2

SCAN OPERATOR EEJ



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

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SECRETARIAT

2013 MAR 29 PM 1:27

March 29, 2013

MEMORANDUM

**SENSITIVE**

TO: The Commission

THROUGH: *AP* Alec Palmer *AP*  
Staff Director

FROM: Patricia C. Orrock *PCO*  
Chief Compliance Officer

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

BY: *JW* Jodi Winship/Sari Pickerall *JP*  
Compliance Branch

SUBJECT: Reason To Believe Recommendation - 2012 30 Day Post-General Report  
(Unauthorized Filers) For The Administrative Fine Program

Attached is a list of political committees and their treasurers who failed to file or timely file the 2012 30 Day Post-General Report in accordance with 2 U.S.C. § 434(a). The list is comprised of unauthorized committees that failed to file or timely file the 2012 30 Day Post-General Report.

The committees appearing on the 30 Day Post-General Report list either failed to file the report, within thirty (30) days of the due date (considered a late filed report), or filed the report more than thirty (30) days after the due date (considered a non-filed report). In accordance with 11 C.F.R. § 111.43, these committees should be assessed the civil money penalties indicated in the attachment.

In order to determine the level of activity for unauthorized quarterly filers that failed to file or failed to timely file the 30 Day Post-General Report, the Reports Analysis Division (RAD) used the following procedures and criteria:

- Every 30 Day Post-General Report (30 Day Report) submitted by an unauthorized quarterly filer that covered the period from October 1, 2012 through November 26, 2012 (57 days), was reviewed for activity which would have required the filing of a 12 Day Report. If our

research indicated that the filing of a 12 Day Report was required, we utilized a two-step method to arrive at the estimated level of activity on which to base the fine amount. First, if the committee had any unitemized activity, a per diem level of activity was used by multiplying the total amount of activity on the report by 25% (17 days (12G Filing Period)/57 days (30G Filing Period)). The committees identified through this process as failing to file or failing to timely file the 12 Day Pre-General Report were included in the Reason to Believe Recommendation circulated to the Commission on March 28, 2013. If the same committee also failed to file the 30 Day Report in a timely manner, we based the 30 Day Report fine on the amount of the remaining level of activity. We arrived at this amount by subtracting the estimated level of activity for the 12 Day Report from the total amount of activity on the 30 Day Report. In these cases, the committees will also be assessed a fine for the 30 Day Reports based on the estimated levels of activity described above and are included on the attached list.

### **Recommendation**

1. Find reason to believe that the political committees and their treasurers listed on the RTB Circulation Reports violated 2 U.S.C. § 434(a) and make a preliminary determination that the civil money penalties would be the amounts indicated on the RTB Circulation Reports.
2. Send the appropriate letters.

**Federal Election Commission**  
**Reason to Believe Circulation Report**  
**2012 POST-GENERAL Not Election Sensitive 12/06/2012 UNAUTH**

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
2671	C00420125	CHIANG PATEL AND YERBY INC PAC		DAVID W. HAYS	\$146,325	1	1/31/2013	Not Filed	\$2,000	\$312
2672	C00422352	CLEAN ENERGY PAC OF IBERDROLA RENEWABLES, INC.		RICHARD A GLICK	\$119,987	0	1/14/2013	Not Filed	\$25,473	\$990
2673	C00451518	CROWE PAC		ROBERT W. LAZARD	\$267,737	0	12/12/2012	6	\$24,149	\$140
2674	C00468009	EDWARDS WILDMAN PAC INC		KEITH KOTLER	\$418,082	0	2/22/2013	Not Filed	\$22,291	\$550
2675	C00163956	I.U.O.E LOCAL 15 POLITICAL ACTION COMMITTEE		ROBERT J. BURNS	\$756,776	0	12/28/2012	22	\$29,995	\$640
2676	C00495259	IMMIGRATION911, LLC		STANLEY P. DULL	\$505,587	1	2/13/2013	Not Filed	\$24,971	\$687
2677	C00354613	INT LONGSHOREMENS ASSOC (ILA) LOCAL 1291 POLITICAL ACTION COMMITTEE		MARTIN MASCUILLI	\$109,509	1	1/30/2013	Not Filed	\$9,208	\$412
2678	C00417717	KENTUCKY FORWARD PAC		R. WAYNE STRATTON	\$116,770	0	2/6/2013	Not Filed	\$17,293	\$550
2679	C00426320	LIBERTARIAN PARTY OF INDIANA		TODD SINGER	\$175,056	3	1/31/2013	Not Filed	\$10,231	\$962
2680	C00357905	LOUISIANA SHERIFFS AND DEPUTIES POLITICAL ACTION COMMITTEE		MIKE CAZES	\$568,859	0	12/21/2012	15	\$23,867	\$185
2681	C00426809	MADISON PAC, THE		BRIAN J. AHERN	\$694,588	0	12/23/2012	17	\$20,236	\$195
2682	C00188011	NATIONAL TANK TRUCK CARRIERS INC POLITICAL ACTION COMMITTEE		WILLIAM A. USHER	\$114,493	0		Not Filed	\$1,747	\$250
2683	C00040857	OAKLAND COUNTY DEMOCRATIC PARTY PLUMBERS AND		RYAN J. GESUND	\$3,853,243	1	1/21/2013	Not Filed	\$187,674	\$7,562
2684	C00137794	PIPEFITTERS LOCAL UNION #25 FEDERAL POLITICAL ACTION COMMITTEE FUND		W. THOMAS MCCUNE, JR.	\$111,293	0	12/13/2012	7	\$11,753	\$145
2685	C00405233	SCDCC: SONOMA CO. DEM. CEN.COM.		DONALD RICHARD FRANK	\$289,015	0	12/15/2012	9	\$11,912	\$155

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
2686	C00466011	TRUST WOMEN PAC		TIFFANY REYNOLDS-RICHARDSON	\$298,361	1	1/16/2013	Not Filed	\$52,362	\$3,712
2687	C00446674	WESTERN SUGAR COOPERATIVE POLITICAL ACTION COMMITTEE		J. KENT WIMMER	\$299,912	0	1/2/2013	27	\$2,000	\$160
2688	C00424150	WOMEN'S CAMPAIGN FORUM		SIOBHAN BENNETT	\$390,544	3	12/18/2012	12	\$82,160	\$3,080

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
)  
Reason To Believe Recommendation – )  
2012 30 Day Post-General Report )  
(Unauthorized Filers) For The )  
Administrative Fine Program: )  
CHIANG PATEL AND YERBY INC PAC, ) AF# 2671  
and DAVID W HAYS as treasurer; )  
CLEAN ENERGY PAC OF IBERDROLA ) AF# 2672  
RENEWABLES, INC., and GLICK, )  
RICHARD A as treasurer; )  
CROWE PAC, and LAZARD, ROBERT ) AF# 2673  
W. MR. as treasurer; )  
EDWARDS WILDMAN PAC INC, and ) AF# 2674  
KOTLER, KEITH as treasurer; )  
I.U.O.E LOCAL 15 POLITICAL ACTION ) AF# 2675  
COMMITTEE, and BURNS, ROBERT J. as )  
treasurer; )  
IMMIGRATION911, LLC, and STANLEY ) AF# 2676  
P DULL as treasurer; )  
INT LONGSHOREMENS ASSOC (ILA) ) AF# 2677  
LOCAL 1291 POLITICAL ACTION )  
COMMITTEE, and MARTIN MASCULLI )  
as treasurer; )  
KENTUCKY FORWARD PAC, and ) AF# 2678  
WAYNE STRATTON as treasurer; )  
LIBERTARIAN PARTY OF INDIANA, ) AF# 2679  
and TODD SINGER as treasurer; )  
LOUISIANA SHERIFFS AND DEPUTIES ) AF# 2680  
POLITICAL ACTION COMMITTEE, and )  
CAZES, MIKE as treasurer; )  
MADISON PAC; THE, and AHERN, ) AF# 2681  
BRIAN J. MR. as treasurer; )  
NATIONAL TANK TRUCK CARRIERS ) AF# 2682  
INC POLITICAL ACTION COMMITTEE, )  
and WILLIAM A USHER as treasurer; )

OAKLAND COUNTY DEMOCRATIC ) AF# 2683  
PARTY, and GESUND, RYAN J. as )  
treasurer; )  
PLUMBERS AND PIPEFITTERS LOCAL ) AF# 2684  
UNION #25 FEDERAL POLITICAL )  
ACTION COMMITTEE FUND, and W )  
THOMAS MCCUNE JR as treasurer; )  
SCDCC: SONOMA CO. DEM. ) AF# 2685  
CEN.COM., and FRANK, DONALD )  
RICHARD MR. as treasurer; )  
TRUST WOMEN PAC, and REYNOLDS- ) AF# 2686  
RICHARDSON, TIFFANY as treasurer; )  
WESTERN SUGAR COOPERATIVE ) AF# 2687  
POLITICAL ACTION COMMITTEE, and )  
KENT, J. MR. WIMMER as treasurer; )  
WOMEN'S CAMPAIGN FORUM, and ) AF# 2688  
SIOBHAN BENNETT as treasurer; )

CERTIFICATION

I, Shawn Woodhead Werth, Secretary and Clerk of the Federal Election Commission, do hereby certify that on April 01, 2013 the Commission took the following actions on the Reason To Believe Recommendation – 2012 30 Day Post-General Report (Unauthorized Filers) For The Administrative Fine Program as recommended in the Reports Analysis Division's Memorandum dated March 29, 2013, on the following committees:

AF#2671 Decided by a vote of 5-0 to: (1) find reason to believe that CHIANG PATEL AND YERBY INC PAC, and DAVID W HAYS as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2672 Decided by a vote of 5-0 to: (1) find reason to believe that CLEAN ENERGY PAC OF IBERDROLA RENEWABLES, INC., and GLICK, RICHARD A as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil

money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2673 Decided by a vote of 5-0 to: (1) find reason to believe that CROWE PAC, and LAZARD, ROBERT W. MR. as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2674 Decided by a vote of 5-0 to: (1) find reason to believe that EDWARDS WILDMAN PAC INC, and KOTLER, KEITH as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2675 Decided by a vote of 5-0 to: (1) find reason to believe that I.U.O.E LOCAL 15 POLITICAL ACTION COMMITTEE, and BURNS, ROBERT J. as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2676 Decided by a vote of 5-0 to: (1) find reason to believe that IMMIGRATION911, LLC, and STANLEY P DULL as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2677 Decided by a vote of 5-0 to: (1) find reason to believe that INT LONGSHOREMENS ASSOC (ILA) LOCAL 1291 POLITICAL ACTION COMMITTEE, and MARTIN MASCUILLI as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2678 Decided by a vote of 5-0 to: (1) find reason to believe that KENTUCKY FORWARD PAC, and WAYNE STRATTON as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2679 Decided by a vote of 5-0 to: (1) find reason to believe that LIBERTARIAN PARTY OF INDIANA, and TODD SINGER as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would



be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2680 Decided by a vote of 5-0 to: (1) find reason to believe that LOUISIANA SHERIFFS AND DEPUTIES POLITICAL ACTION COMMITTEE, and CAZES, MIKE as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2681 Decided by a vote of 5-0 to: (1) find reason to believe that MADISON PAC; THE, and AHERN, BRIAN J. MR. as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2682 Decided by a vote of 5-0 to: (1) find reason to believe that NATIONAL TANK TRUCK CARRIERS INC POLITICAL ACTION COMMITTEE, and WILLIAM A USHER as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2683 Decided by a vote of 5-0 to: (1) find reason to believe that OAKLAND COUNTY DEMOCRATIC PARTY, and GESUND, RYAN J. as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2684 Decided by a vote of 5-0 to: (1) find reason to believe that PLUMBERS AND PIPEFITTERS LOCAL UNION #25 FEDERAL POLITICAL ACTION COMMITTEE FUND, and W THOMAS MCCUNE JR as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2685 Decided by a vote of 5-0 to: (1) find reason to believe that SCDCC: SONOMA CO. DEM. CEN.COM., and FRANK, DONALD RICHARD MR. as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2686 Decided by a vote of 5-0 to: (1) find reason to believe that TRUST WOMEN PAC, and REYNOLDS-RICHARDSON, TIFFANY as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2687 Decided by a vote of 5-0 to: (1) find reason to believe that WESTERN SUGAR COOPERATIVE POLITICAL ACTION COMMITTEE, and KENT, J. MR. WIMMER as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2688 Decided by a vote of 5-0 to: (1) find reason to believe that WOMEN'S CAMPAIGN FORUM, and SIOBHAN BENNETT as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Attest:

April 2, 2013  
Date

Shawn Woodhead Werth  
Shawn Woodhead Werth  
Secretary and Clerk of the Commission



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

April 2, 2013

Ryan J. Gesund, in official capacity as Treasurer  
Oakland County Democratic Party  
24445 Northwestern Hwy., Suite 110  
Southfield, MI 48075

C00040857  
AF#: 2683

Dear Mr. Gesund:

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file a 30 Day Post-General Report of Receipts and Disbursements in a calendar year in which a regularly scheduled general election is held. This report, covering the period through November 26, 2012, shall be filed no later than December 6, 2012. 2 U.S.C. 434(a). Because records at the Federal Election Commission ("FEC") indicate that you did not file this report within thirty (30) days of the due date, the report is considered not filed for the purpose of calculating the civil money penalty.

The Act permits the FEC to impose civil money penalties for violations of the reporting requirements of 2 U.S.C. 434(a). 2 U.S.C. 437g(a)(4). On April 1, 2013, the FEC found that there is reason to believe ("RTB") that Oakland County Democratic Party and you, in your official capacity as treasurer, violated 2 U.S.C. 434(a) by failing to file timely this report on or before December 6, 2012. Based on the FEC's schedules of civil money penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at the RTB stage is \$7,562. Please see the attached copy of the Commission's administrative fine regulations at 11 CFR §§ 111.30-111.55. Attachment 1. The Commission's website contains further information about how the administrative fine program works and how the fines are calculated. See <http://www.fec.gov/af/af.shtml>. 11 CFR § 111.34. Your payment of \$7,562 is due within forty (40) days of the finding, or by May 11, 2013, and is based on these factors:

Election Sensitivity of Report: Not Election Sensitive

Level of Activity: \$187,674

Number of Days Late: Not Filed (reports not filed within thirty (30) days of the due date are considered not filed for the purpose of calculating the penalty)

Number of Previous Civil Money Penalties Assessed: 1

At this juncture, the following courses of action are available to you:

**1. If You Choose to Challenge the RTB Finding and/or Civil Money Penalty**

If you should decide to challenge the RTB finding and/or calculated civil money penalty, you must submit a written response, including the AF# found at the top of page 1 under your committee's identification number, to the FEC's Office of Administrative Review, 999 E Street, NW, Washington, DC 20463. Your response must be received within forty (40) days of the Commission's RTB finding, or May 11, 2013. 11 CFR § 111.35(a). Your written response must include the reason(s) why you are challenging the RTB finding and/or calculated civil money penalty, and must include the factual basis supporting the reason(s) and supporting documentation. The FEC strongly encourages that documents be submitted in the form of affidavits or declarations. 11 CFR § 111.36(c).

The FEC will only consider challenges that are based on at least one of three grounds: (1) a factual error in the RTB finding; (2) miscalculation of the calculated civil money penalty by the FEC; or (3) your demonstrated use of best efforts to file in a timely manner when prevented from doing so by reasonably unforeseen circumstances that were beyond your control. 11 CFR § 111.35(b). In order for a challenge to be considered on the basis of best efforts, you must have filed the required report no later than 24 hours after the end of these reasonably unforeseen circumstances. *Id.* Examples of circumstances that will be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) a failure of Commission computers or Commission-provided software despite your seeking technical assistance from Commission personnel and resources; (2) a widespread disruption of information transmissions over the Internet that is not caused by a failure of the Commission's or your computer systems or Internet service provider; and (3) severe weather or other disaster-related incident. 11 CFR § 111.35(c). Examples of circumstances that will not be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) negligence; (2) delays caused by vendors or contractors; (3) treasurer and staff illness, inexperience or unavailability; (4) committee computer, software, or Internet service provider failures; (5) failure to know filing dates; and (6) failure to use filing software properly. 11 CFR § 111.35(d).

The "failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver" of your right to present such argument in a petition to the U.S. district court under 2 U.S.C. § 437g. 11 CFR § 111.38.

If you intend to be represented by counsel, please advise the Office of Administrative Review. You should provide, in writing, the name, address and telephone number of your counsel and authorize counsel to receive notifications and communications relating to this challenge and imposition of the calculated civil money penalty.

## **2. If You Choose Not to Pay the Civil Money Penalty and Not to Submit a Challenge**

If you do not pay the calculated civil money penalty and do not submit a written response, the FEC will assume that the preceding factual allegations are true and make a final determination that Oakland County Democratic Party and you, in your official capacity as treasurer, violated 2 U.S.C. § 434(a) and assess a civil money penalty.

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA"), as amended by the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701 *et seq.* The FEC may take any and all appropriate

action authorized and required by the DCA, as amended, including transfer to the U.S. Department of the Treasury for collection. 11 CFR § 111.51(a)(2).

**3. If You Choose to Pay the Civil Money Penalty**

If you should decide to pay the calculated civil money penalty, send the enclosed remittance form, along with your payment, to the FEC at the address on page 4. Upon receipt of your payment, the FEC will send you a final determination letter.

This matter was generated based on information ascertained by the FEC in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. § 437g(a)(2). It will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and 437g(a)(12)(A) until it is placed on the public record in accordance with 11 CFR § 111.42, unless you notify the FEC in writing that you wish the matter to be made public.

As noted earlier, you may obtain additional information on the FEC's administrative fine program, including the final regulations, on the FEC's website at <http://www.fec.gov/af/af.shtml>. If you have questions regarding the payment of the calculated civil money penalty, please contact Sari Pickerall in the Reports Analysis Division at our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130. If you have questions regarding the submission of a challenge, please contact the Office of Administrative Review at our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

On behalf of the Commission,



Ellen L. Weintraub  
Chair

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**ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS**

In accordance with the schedule of penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at RTB is \$7,562 for the 2012 Post-General Report.

Please mail this remittance with a check or money order made payable to the Federal Election Commission to the following address:

Federal Election Commission  
P.O. Box 979058  
St. Louis, MO 63197-9000

If you choose to send your remittance and payment by courier or overnight delivery, please use this address:

U.S. Bank - Government Lockbox  
FEC #979058  
1005 Convention Plaza  
Attn: Government Lockbox, SL-MO-C2GL  
St. Louis, MO 63101

The remittance and your payment are due by May 11, 2013. Upon receipt of your remittance and payment, the FEC will send you a final determination letter.

**PAYMENTS BY PERSONAL CHECK**

Personal checks will be converted into electronic funds transfers (EFTS). Your account will be electronically debited for the amount on your check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

**PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT**  
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FOR: Oakland County Democratic Party

FEC ID#: C00040857

AF#: 2683

PAYMENT DUE DATE: May 11, 2013

PAYMENT AMOUNT DUE: \$7,562



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
SECRETARIAT

2013 JUN -6 PM 3: 11

June 6, 2013

**SENSITIVE**

MEMORANDUM

TO: The Commission

THROUGH: Alec Palmer  
Staff Director

FROM: Patricia C. Orrock *PCO*  
Chief Compliance Officer

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

BY: *KD* Kristin DeCarmine/Sari Pickerall *dp*  
Compliance Branch

SUBJECT: Administrative Fine Program – Final Determination Recommendation for the  
2012 30 Day Post-General Report (Unauthorized Committees)

Attached are two lists of political committees and their treasurers against which the Commission has found reason to believe (RTB) and assessed proposed civil money penalties calculated at RTB for failure to file or failure to timely file the 2012 30 Day Post-General Report (Unauthorized Committees). The first list represents the committees that have paid the civil money penalty and the second list represents those committees that have not paid the civil money penalty. The committees that have not paid have been given at least forty (40) days from the date of the Commission's RTB finding to remit payment.

In accordance with 11 CFR § 111.34 and 11 CFR § 111.40, the Commission shall send a final determination notice to those respondents that have either paid or not paid the civil money penalty.

For your information, two (2) committees detailed below designated a new Treasurer after the RTB finding:

- Edwards Wildman PAC INC (AF 2674) filed an Amended Statement of Organization after the RTB finding designating John Holthaus, as Treasurer (see first list).

- TELEPHONE

TELEPHONE

- TELEPHONE



Federal Election Commission  
FD Circulation Report - Fine Paid  
2012 POST-GENERAL Not Election Sensitive 12/06/2012 UNAUTH

AF#	Committee Name	Candidate Name	Committee ID	Treasurer	Receipt Date	Days Late	LOA	PV	RTB Date	RTB Penalty	Final Money Penalty	Date Paid	Amount Paid
2671	CHIANG PATEL AND YERBY INC PAC		C00420125	DAVID W. HAYS	01/31/2013	Not Filed	\$2,000	1	04/01/2013	\$312	\$312	04/09/2013	\$312
2672	CLEAN ENERGY PAC OF IBERDROLA RENEWABLES, INC.		C00422352	RICHARD A. GLICK	01/14/2013	Not Filed	\$25,473	0	04/01/2013	\$990	\$990	05/07/2013	\$990
2673	CROWE PAC		C00451518	ROBERT W. LAZARD	12/12/2012	6	\$24,149	0	04/01/2013	\$140	\$140	04/12/2013	\$140
2674	EDWARDS WILDMAN PAC INC		C00468009	JOHN HOLTHAUS	02/22/2013	Not Filed	\$22,291	0	04/01/2013	\$550	\$550	05/14/2013	\$550
2676	IMMIGRATION 1, LLC		C00495259	STANLEY P. DULL	02/13/2013	Not Filed	\$24,971	1	04/01/2013	\$687	\$687	04/30/2013	\$687
2677	INT LONGSHOREMENS ASSOC (ILA) LOCAL 1291 POLITICAL ACTION COMMITTEE		C00354613	MARTIN MASCUILLI	01/30/2013	Not Filed	\$9,208	1	04/01/2013	\$412	\$412	05/10/2013	\$412
2679	LIBERTARIAN PARTY OF INDIANA		C00426320	MICHAEL C. SCHULTHEISS	01/31/2013	Not Filed	\$10,231	3	04/01/2013	\$962	\$962	04/17/2013	\$962
2680	LOUISIANA SHERIFFS AND DEPUTIES POLITICAL ACTION COMMITTEE		C00357905	MIKE CAZES	12/21/2012	15	\$23,867	0	04/01/2013	\$185	\$185	05/03/2013	\$185
2681	MADISON PAC: THE WESTERN SUGAR COOPERATIVE POLITICAL ACTION COMMITTEE		C00426809	BRIAN J. AHERN	12/23/2012	17	\$20,236	0	04/01/2013	\$195	\$195	04/23/2013	\$195
2687	WOMEN'S CAMPAIGN FORUM		C00446674	J. KENT WIMMER	01/02/2013	27	\$2,000	0	04/01/2013	\$160	\$160	04/12/2013	\$160
2688			C00424150	SIOBHAN BENNETT	12/18/2012	12	\$82,160	3	04/01/2013	\$3,080	\$3,080	05/07/2013	\$3,080

**Federal Election Commission**  
**FD Circulation Report: Fine Not Paid**  
**2012 POST-GENERAL Not Election Sensitive 12/06/2012 UNAUTH**

AF#	Committee Name	Candidate Name	Committee ID	Treasurer	Receipt Date	Days Late	LOA	PV	RTB Date	RTB Penalty	Days Since RTB	FD Penalty
2678	KENTUCKY FORWARD PAC		C00417717	WAYNE STRATTON	02/06/2013	Not Filed	\$17,293	0	04/01/2013	\$550	66	\$550
2683	OAKLAND COUNTY DEMOCRATIC PARTY		C00040857	RYAN J. GESUND	01/21/2013	Not Filed	\$187,674	1	04/01/2013	\$7,562	66	\$7,562
2686	TRUST WOMEN PAC		C00466011	TIFFANY REYNOLDS-RICHARDSON	01/16/2013	Not Filed	\$53,836	1	04/01/2013	\$3,712	66	\$3,712

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
)  
Administrative Fine Program - Final )  
Determination Recommendation for the )  
2012 30 Day Post-General Report )  
(Unauthorized Committees): )  
CHIANG PATEL AND YERBY INC PAC, ) AF# 2671  
and DAVID W HAYS as treasurer; )  
CLEAN ENERGY PAC OF IBERDROLA ) AF# 2672  
RENEWABLES, INC., and GLICK, )  
RICHARD A as treasurer; )  
CROWE PAC, and LAZARD, ROBERT ) AF# 2673  
W. MR. as treasurer; )  
EDWARDS WILDMAN PAC INC, and ) AF# 2674  
HOLTHAUS, JOHN as treasurer; )  
IMMIGRATION911, LLC, and STANLEY ) AF# 2676  
P DULL as treasurer; )  
INT LONGSHOREMENS ASSOC (ILA) ) AF# 2677  
LOCAL 1291 POLITICAL ACTION )  
COMMITTEE, and MARTIN MASCUILLI )  
as treasurer; )  
KENTUCKY FORWARD PAC, and ) AF# 2678  
WAYNE STRATTON as treasurer; )  
LIBERTARIAN PARTY OF INDIANA, ) AF# 2679  
and SCHULTHEISS, MICHAEL C as )  
treasurer; )  
LOUISIANA SHERIFFS AND DEPUTIES ) AF# 2680  
POLITICAL ACTION COMMITTEE, and )  
CAZES, MIKE as treasurer; )  
MADISON PAC; THE, and AHERN, ) AF# 2681  
BRIAN J. MR. as treasurer; )  
OAKLAND COUNTY DEMOCRATIC ) AF# 2683  
PARTY, and GESUND, RYAN J. as )  
treasurer; )  
TRUST WOMEN PAC, and TIFFANY ) AF# 2686  
REYNOLDS-RICHARDSON as treasurer; )

WESTERN SUGAR COOPERATIVE	)	AF# 2687
POLITICAL ACTION COMMITTEE, and	)	
KENT, J. MR. WIMMER as treasurer;	)	
WOMEN'S CAMPAIGN FORUM, and	)	AF# 2688
SIOBHAN BENNETT as treasurer;	)	

CERTIFICATION

I, Shawn Woodhead Werth, Secretary and Clerk of the Federal Election Commission, do hereby certify that on June 07, 2013 the Commission took the following actions on the Administrative Fine Program - Final Determination Recommendation for the 2012 30 Day Post-General Report (Unauthorized Committees) as recommended in the Reports Analysis Division's Memorandum dated June 06, 2013, on the following committees:

AF#2671 Decided by a vote of 5-0 to: (1) make a final determination that CHIANG PATEL AND YERBY INC PAC, and DAVID W HAYS as treasurer , violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2672 Decided by a vote of 5-0 to: (1) make a final determination that CLEAN ENERGY PAC OF IBERDROLA RENEWABLES, INC., and GLICK, RICHARD A as treasurer , violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2673 Decided by a vote of 5-0 to: (1) make a final determination that CROWE PAC, and LAZARD, ROBERT W. MR. as treasurer , violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2674 Decided by a vote of 5-0 to: (1) make a final determination that EDWARDS WILDMAN PAC INC, and HOLTHAUS, JOHN as treasurer , violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the

appropriate letter. Commissioners Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2676 Decided by a vote of 5-0 to: (1) make a final determination that IMMIGRATION911, LLC, and STANLEY P DULL as treasurer , violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2677 Decided by a vote of 5-0 to: (1) make a final determination that INT LONGSHOREMENS ASSOC (ILA) LOCAL 1291 POLITICAL ACTION COMMITTEE, and MARTIN MASCULLI as treasurer , violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2678 Decided by a vote of 5-0 to: (1) make a final determination that KENTUCKY FORWARD PAC, and WAYNE STRATTON as treasurer , violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2679 Decided by a vote of 5-0 to: (1) make a final determination that LIBERTARIAN PARTY OF INDIANA, and SCHULTHEISS, MICHAEL C as treasurer , violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2680 Decided by a vote of 5-0 to: (1) make a final determination that LOUISIANA SHERIFFS AND DEPUTIES POLITICAL ACTION COMMITTEE, and CAZES, MIKE as treasurer , violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2681 Decided by a vote of 5-0 to: (1) make a final determination that MADISON PAC; THE, and AHERN, BRIAN J. MR. as treasurer , violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2683 Decided by a vote of 5-0 to: (1) make a final determination that OAKLAND COUNTY DEMOCRATIC PARTY, and GESUND, RYAN J. as treasurer , violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2686 Decided by a vote of 5-0 to: (1) make a final determination that TRUST WOMEN PAC, and TIFFANY REYNOLDS-RICHARDSON as treasurer , violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2687 Decided by a vote of 5-0 to: (1) make a final determination that WESTERN SUGAR COOPERATIVE POLITICAL ACTION COMMITTEE, and KENT, J. MR. WIMMER as treasurer , violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2688 Decided by a vote of 5-0 to: (1) make a final determination that WOMEN'S CAMPAIGN FORUM, and SIOBHAN BENNETT as treasurer , violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Attest:

June 7, 2013  
Date

Shawn Woodhead Werth  
Shawn Woodhead Werth  
Secretary and Clerk of the Commission



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 10, 2013

Ryan J. Gesund, in official capacity as Treasurer  
Oakland County Democratic Party  
24445 Northwestern Hwy., Suite 110  
Southfield, MI 48075

C00040857  
AF#: 2683

Dear Mr. Gesund:

On April 1, 2013, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that Oakland County Democratic Party and you, in your official capacity as treasurer violated 2 U.S.C. § 434(a) for filing late or failing to file the 2012 Post-General Report. By letter dated April 2, 2013, the Commission notified you of the RTB finding and the civil money penalty calculated at the RTB stage to be \$7,562 in accordance with the schedule of penalties at 11 CFR § 111.43. Within 40 days of the FEC's RTB finding, you, as treasurer, were required to either transmit payment of the calculated civil money penalty or submit a written response challenging either the RTB finding or the calculated civil money penalty.

The FEC did not receive payment of the calculated civil money penalty or a written response within the time permitted. The FEC made a final determination on June 7, 2013 that Oakland County Democratic Party and you, in your official capacity as treasurer, violated 2 U.S.C. § 434(a) and assessed a civil money penalty in the amount of \$7,562 in accordance with 11 CFR § 111.43. The civil money penalty is based on these factors:

Election Sensitivity of Report: Not Election Sensitive

Level of Activity: \$187,674

Number of Days Late: Not Filed (reports not filed within thirty (30) days of the due date are considered not filed for the purposes of calculating the penalty)

Number of Previous Civil Money Penalties Assessed: 1

At this juncture, the following courses of action are available to you:

**1. If You Choose to Appeal the Final Determination and/or Civil Money Penalty**

If you choose to appeal the final determination, you should submit a written petition, within 30 days of receipt of this letter, to the district court of the United States for the district in which the committee or you reside, or transact business, requesting that the final determination be modified or set aside. See 2 U.S.C. § 437g(a)(4)(C)(iii). Your failure to raise an argument in

a timely fashion during the administrative process shall be deemed a waiver of the respondents' right to present such argument in a petition to the district court under 2 U.S.C. § 437g. 11 CFR § 111.38.

## **2. If You Choose Not to Pay the Civil Money Penalty and Not to Appeal**

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA") as amended by the Debt Collection Improvement Act of 1996 ("DCIA"), 31 U.S.C. § 3701 *et seq.* If you do not pay this debt within 30 days (or file a written petition to a federal district court - see below), the Commission will transfer the debt to the U.S. Department of the Treasury ("Treasury") for collection. Within 5 days of the transfer to Treasury, Treasury will contact you to request payment. Treasury currently charges a fee of 28% of the civil money penalty amount for its collection services. The fee will be added to the amount of the civil money penalty that you owe. Should Treasury's attempts fail, Treasury will refer the debt to a private collection agency ("PCA"). If the debt remains unpaid, Treasury may recommend that the Commission refer the matter to the Department of Justice for litigation.

Actions which may be taken to enforce recovery of a delinquent debt by Treasury may also include: (1) offset of any payments, which the debtor is due, including tax refunds and salary; (2) referral of the debt to agency counsel for litigation; (3) reporting of the debt to a credit bureau; (4) administrative wage garnishment; and (5) reporting of the debt, if discharged, to the IRS as potential taxable income. In addition, under the provisions of DCIA and other statutes applicable to the FEC, the debtor may be subject to the assessment of other statutory interest, penalties, and administrative costs.

In accordance with the DCIA, at your request, the agency will offer you the opportunity to inspect and copy records relating to the debt, the opportunity for a review of the debt, and the opportunity to enter into a written repayment agreement.

## **3. If You Choose to Pay the Civil Money Penalty**

If you should decide to pay the civil money penalty, send the enclosed remittance form, along with your payment, to the address on page 4 within 30 days of receipt of this letter.

## **NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS**

### **4. Partial Payments**

If you make a payment in an amount less than the civil money penalty, the amount of your partial payment will be credited towards the full civil money penalty that the Commission assessed upon making a final determination.

### **5. Settlement Offers**

If you make a payment in an amount less than the civil money penalty as an offer to settle or compromise a debt owed to the Commission, the offer is herewith rejected despite any restrictive endorsements contained on your check or money order or proposed in correspondence



transmitted with your check or money order. Acceptance and deposit or cashing of such a restricted payment does not constitute acceptance of the settlement offer. Payments containing restrictive endorsements will be deposited and treated as a partial payment towards the civil money penalty that the Commission assessed upon making a final determination. All unpaid civil money penalty amounts remaining will be subject to the debt collection procedures set forth in Section 2, above.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. The file will be made a part of the public record pursuant to 11 CFR § 111.42(b). Although the file must be placed on the public record within thirty (30) days from the date of the Commission's notification, this could occur at anytime following certification of the Commission's vote.

If you have any questions regarding the payment of the civil money penalty, please contact Sari Pickerall at Federal Election Commission, 999 E St., NW, Washington, DC 20463, or our toll free number (800) 424-9530 (at the prompt, press 5) or (202) 694-1130.

On behalf of the Commission,



Ellen L. Weintraub  
Chair

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**ADMINISTRATIVE FINE PAYMENT INSTRUCTIONS**

In accordance with the schedule of penalties at 11 CFR § 111.43, the civil money penalty is \$7,562 for the 2012 Post-General Report.

This penalty should be paid by check or money order made payable to the Federal Election Commission. It should be sent by mail to:

Federal Election Commission  
PO Box 979058  
St. Louis, MO 63197-9000

If you choose to send your payment by courier or overnight delivery, please use this address:

U.S. Bank - Government Lockbox  
FEC #979058  
1005 Convention Plaza  
Attn: Government Lockbox, SL-MO-C2GL  
St. Louis, MO 63101

The form and payment are due within 30 days of receipt of this letter.

**Payments by Personal Check**

Personal checks will be converted into electronic funds transfers (EFTs). Your account will be electronically debited for the amount on the check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

**PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT**

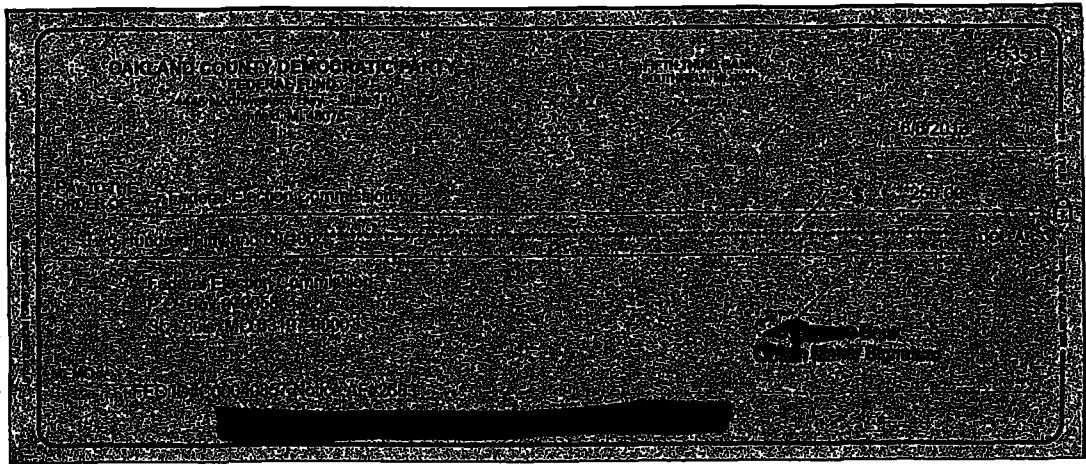
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FOR: Oakland County Democratic Party

FEC ID#: C00040857

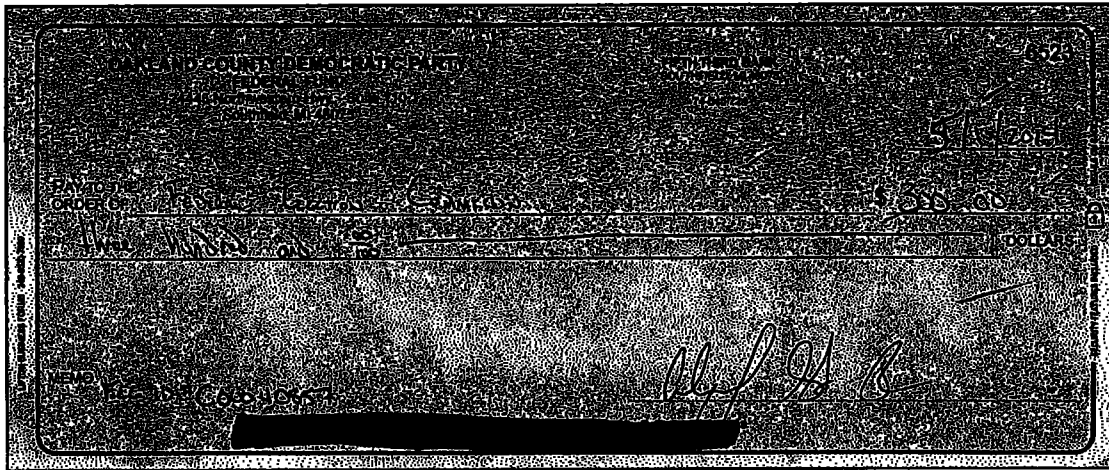
AF#: 2683

PAYMENT AMOUNT DUE: \$7,562

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(314) 425-1818

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**St. Louis GA Lockbox  
(314) 425-1818**

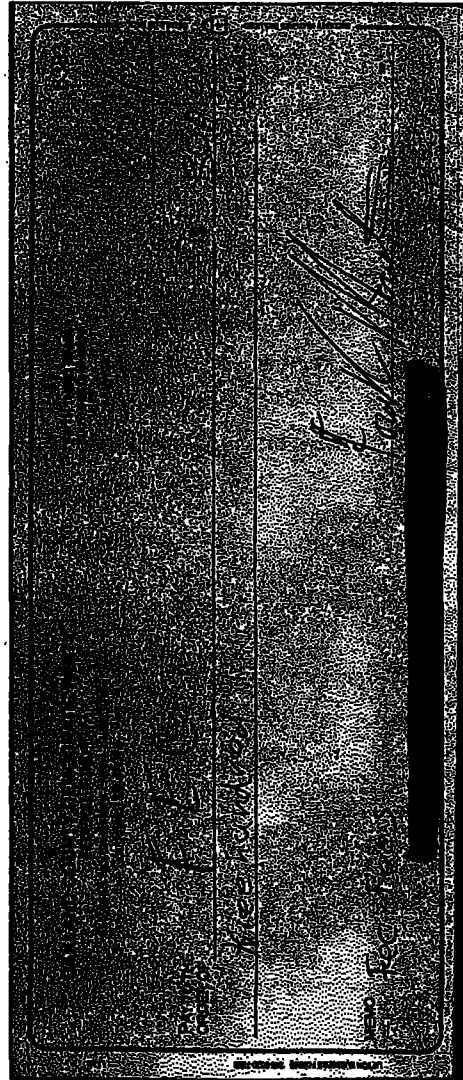


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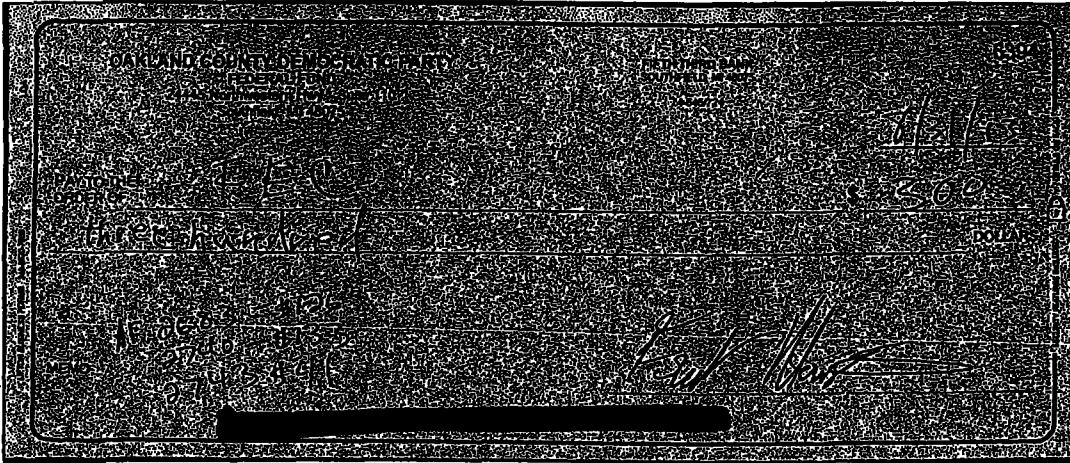
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St. Louis GA Lockbox  
(314) 425-1818

FEDERAL ELECTION COMMISSION

Lockbox: GLX-979058    Ledger Date 08/16/2013

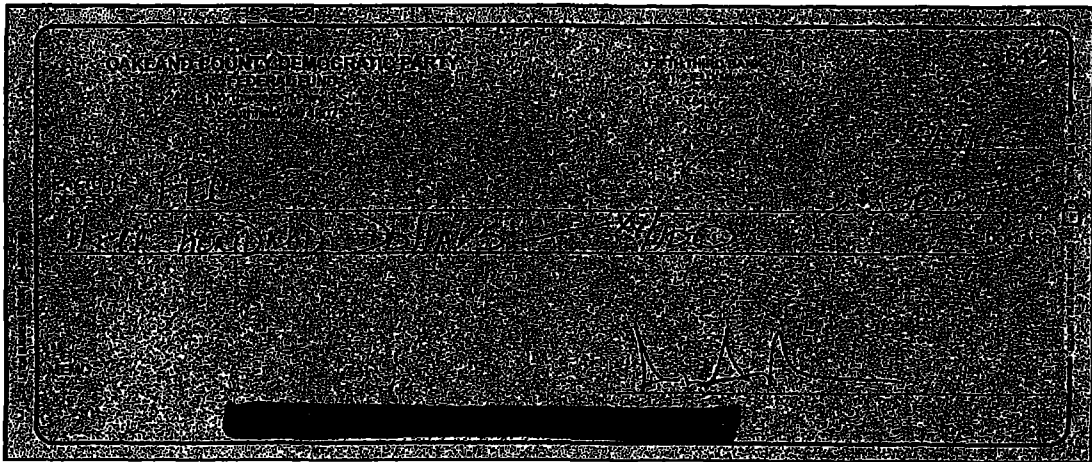


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(314) 425-1818

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(314) 425-1818

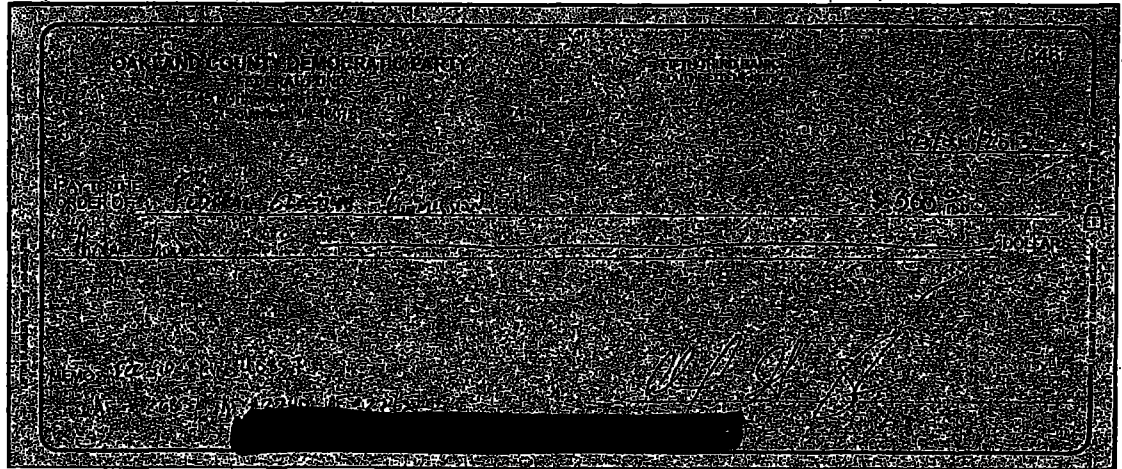
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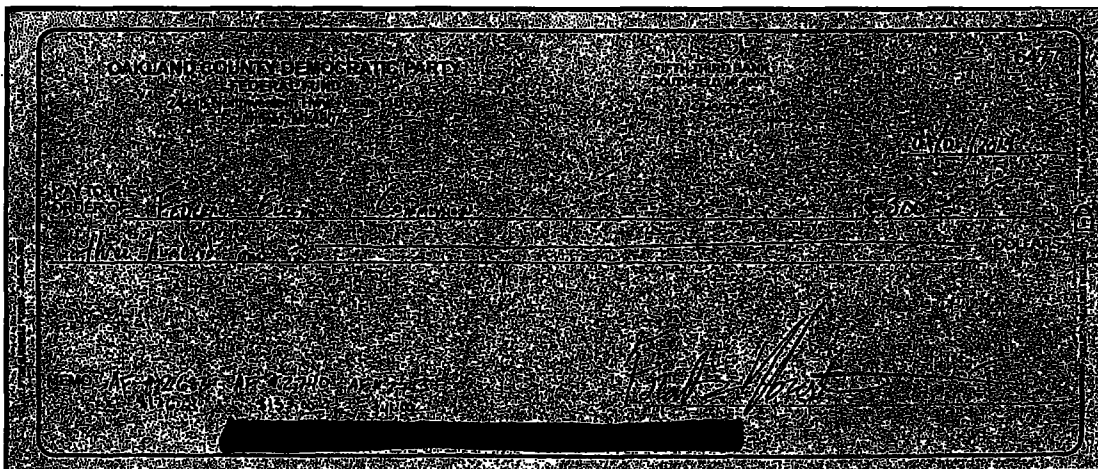
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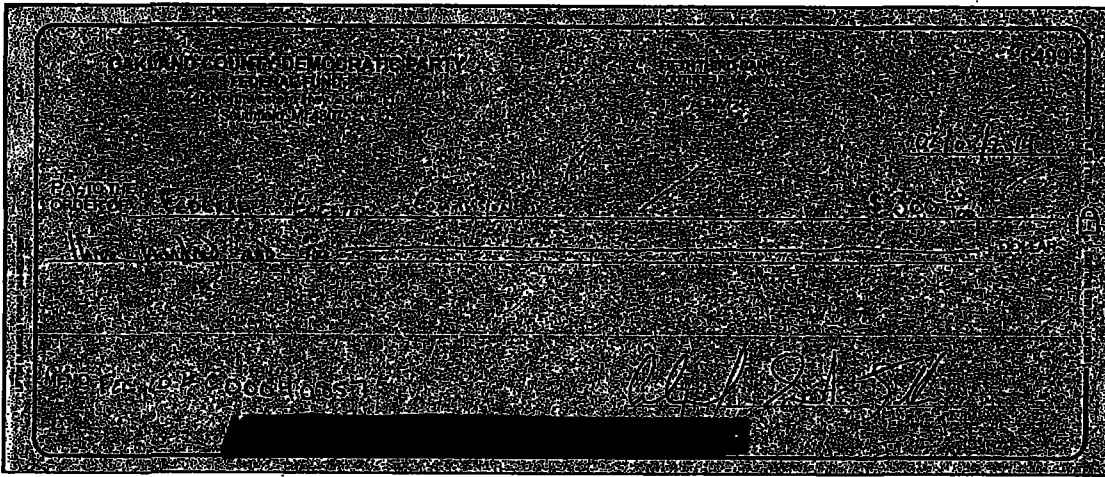
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**usbank.**  
St. Louis GA Lockbox  
(314) 425-1818



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**usbank.**St. Louis GA Lockbox  
(314) 425-1818

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OCDP  
24445 NORTHWESTERN Hwy  
Suite 110  
Southfield, MI 48075

METROPLEX MI 480

28 FEB 2014 PM 16 L



FEDERAL ELECTION COMMISSION

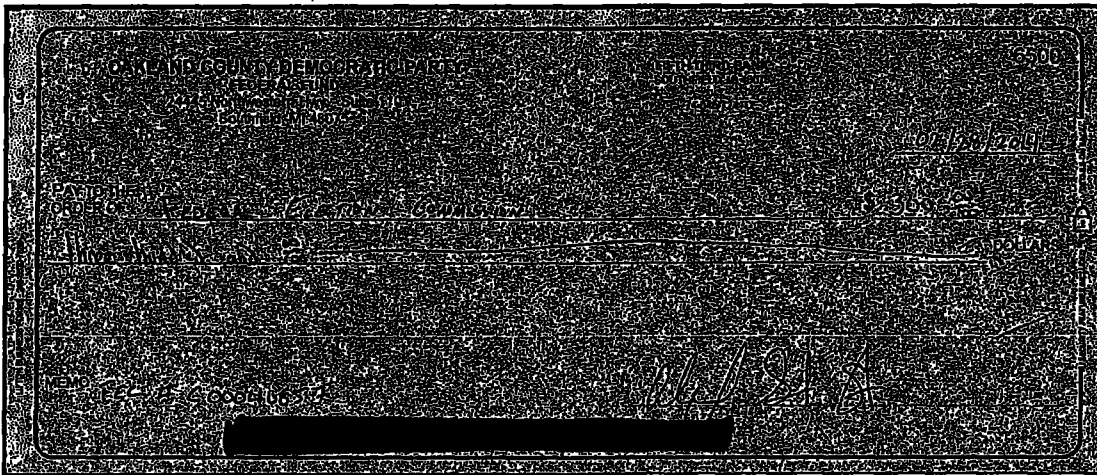
ADMINISTRATIVE FINES DIVISION

PO Box 979058

St. Louis, MO 63197-9058

63197900058



**usbank**St. Louis GA Lockbox  
(314) 425-1818

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0609  
24445 Northwest Hwy  
Suite 110  
Southfield, MI 48075

METROPLEX MI 480

28 FEB 2014 PM 16 L

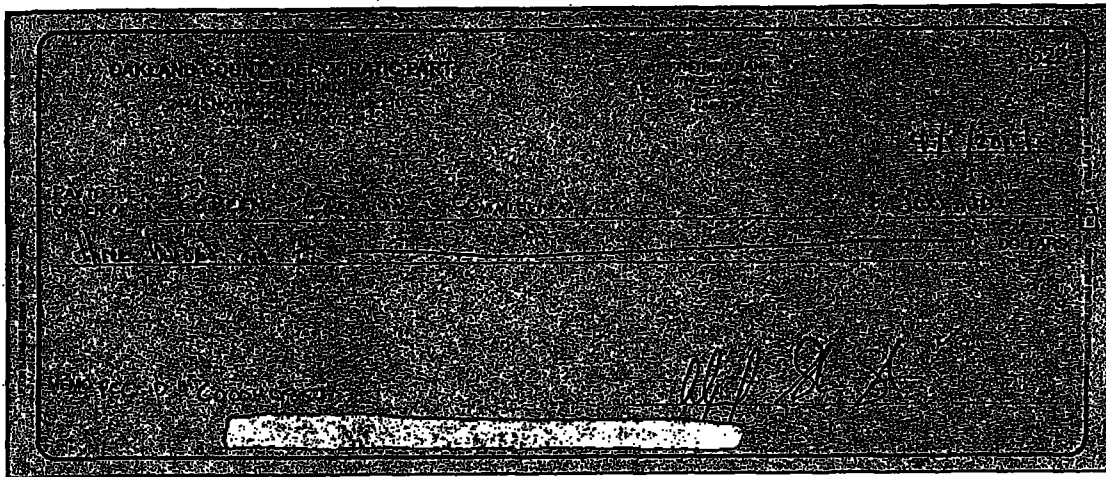
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ADMINISTRATIVE FINES DIVISION

PO Box 979058

ST. LOUIS, MO 63197-9000

63197900058



**usbank.**St. Louis GA Lockbox  
(314) 425-1818

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OCDP

24445 NORTHWESTERN HWY

SUITE 110

SOUTHFIELD, MI 48075

METROPLEX MI 480

15 APR 2014 PM 2:1

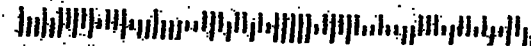
FEDERAL ELECTION COMMISSION

ADMINISTRATIVE FINES DIVISION

P.O. Box 979058

ST. LOUIS, MO 63147-9000

63197900058



Lockbox: GLX-979058 · Ledger Date 06/19/201

St. Louis GA Lockbox  
(314) 425-1818

OAKLAND COUNTY DEMOCRATIC PARTY  
GENERAL FUND

PAY TO THE ORDER OF Wm. C. Smith Community Ch.

\$ 60.00

SIXTY DOLLARS AND NO CENTS

MEMO: P.C.D.#C058468-10

DATE 6/7/68

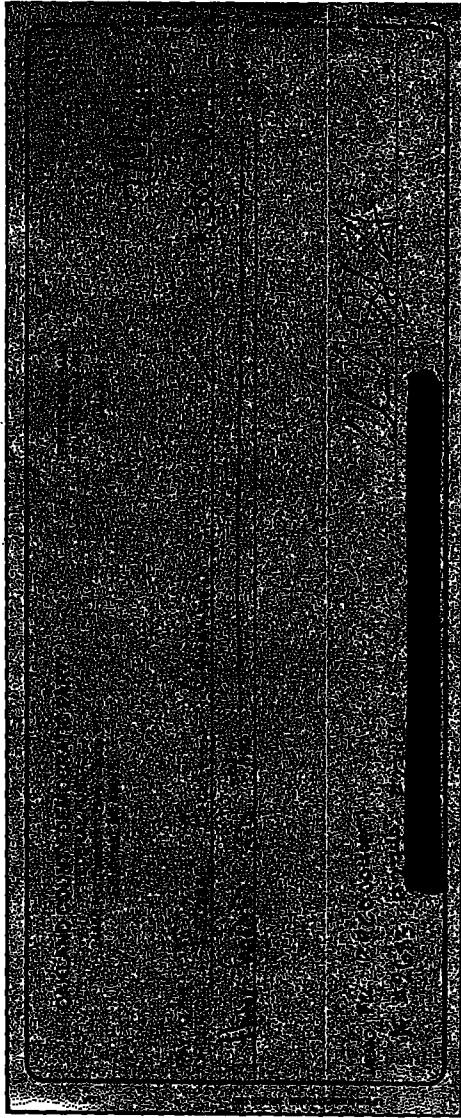
BY [Signature]

IN 256

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**usbank**  
St. Louis GA Lockbox  
(314) 425-1818

FEDERAL ELECTION COMMISSION      Lockbox: GLX-979058      Ledger Date 07/07/2014

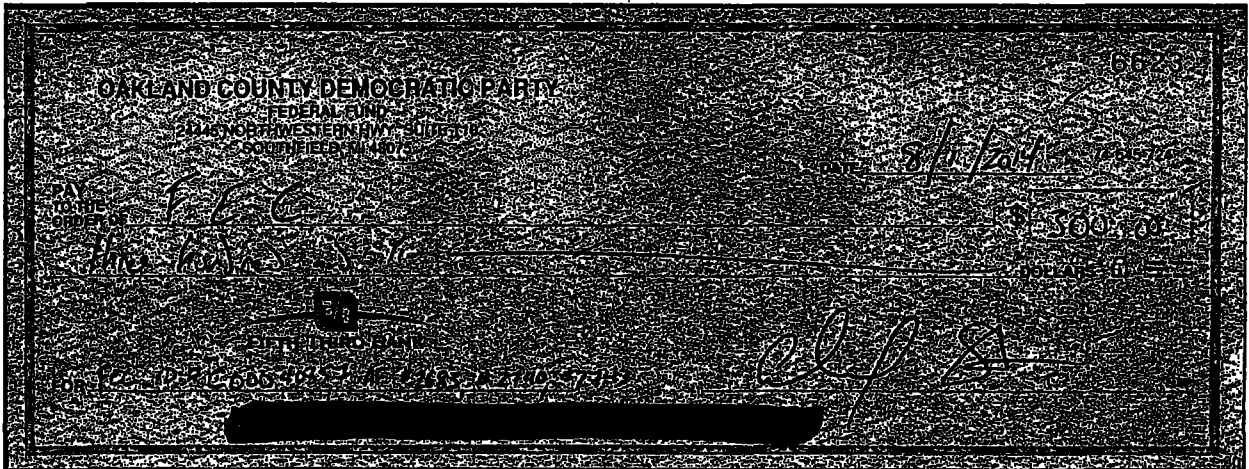


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Lockbox: GLX-979058    Ledger Date: 08/15/2014



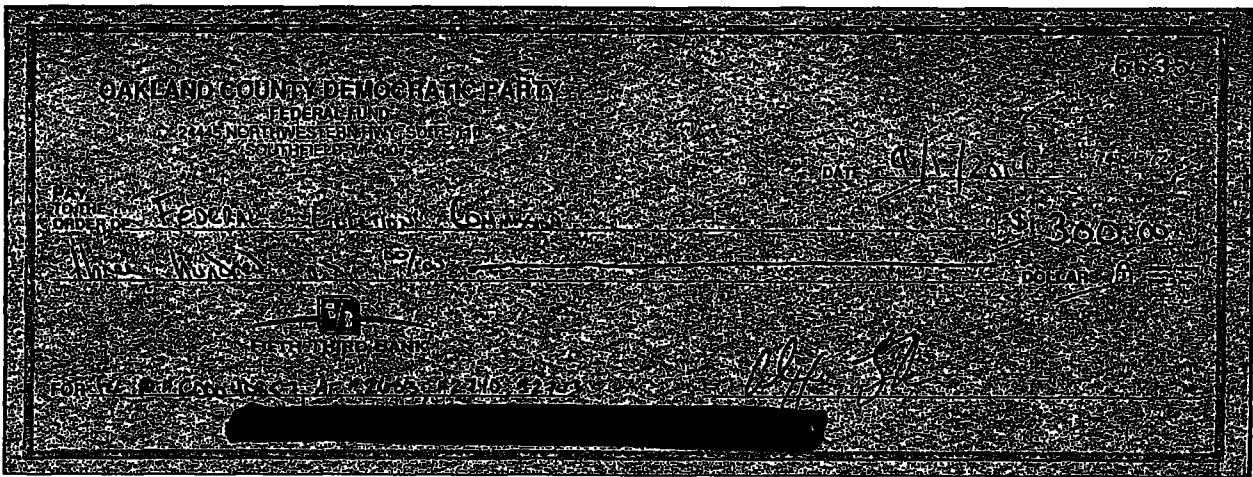
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(314) 425-1818**



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**St. Louis GA Lockbox  
(314) 425-1818**



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0600  
24445 NORTHWESTERN HWY, STE 110  
SOUTHFIELD, MI 48075

MIETROPLEX MI 480

06 SEP 2014 PM 7 L

FEDERAL ELECTION COMMISSION

ADMINISTRATIVE FINES DIVISION

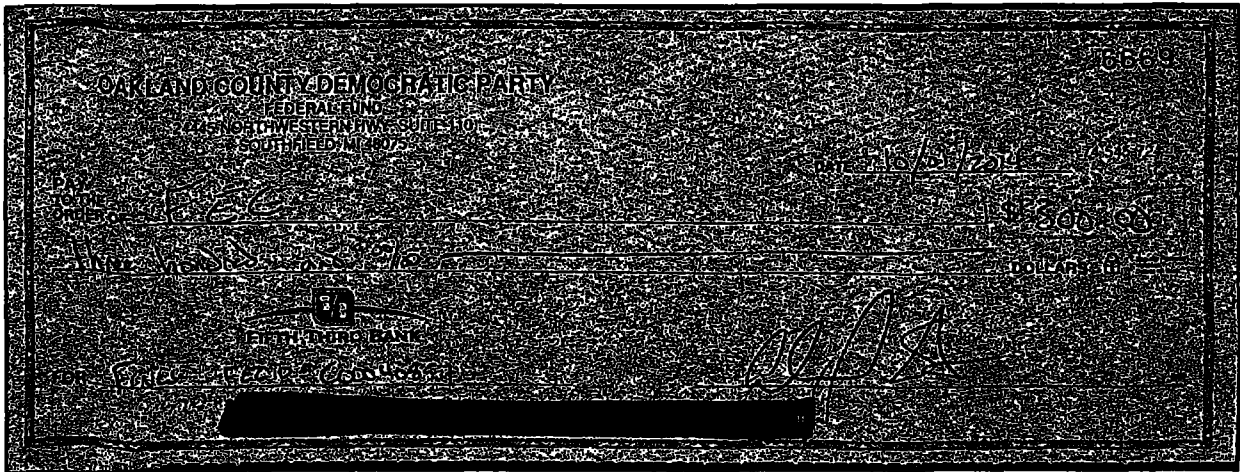
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ST. LOUIS, MO 63197-9000

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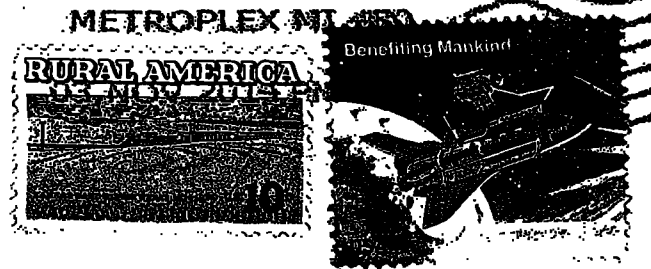




**usbank.**St. Louis GA Lockbox  
(314) 425-1818

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244815 NORTHWESTERN HWY  
SUITE 710  
SOUTHFIELD, MI 48075



FEC

ADMINISTRATIVE FINES DIVISION

P.O. Box 979058

ST. LOUIS, MO 63197-9058

63197900058

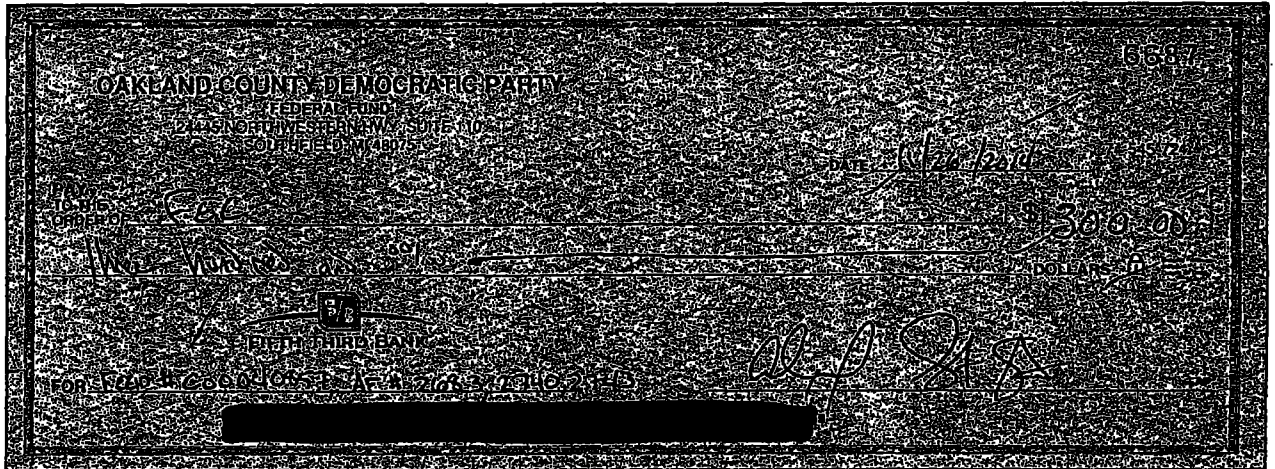




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**St. Louis GA Lockbox  
(314) 425-1818**



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FEDERAL ELECTION COMMISSION  
Washington DC 20463

THIS IS THE END OF ADMINISTRATIVE FINE CASE # 2683

DATE SCANNED 2/23/15

SCANNER NO. 2

SCAN OPERATOR EEJ